



October 26, 2000

Mrs. Gwen Zervas  
Case Manager  
New Jersey Department of Environmental Protection (NJDEP)  
Bureau of Federal Case Management  
Division of Responsible Site Party Remediation Subject  
CN 028  
Trenton, NJ 08625-0028

Subject: **L. E. Carpenter & Company (LEC)**  
MW19/Hot Spot 1 Well Installation Workplan

Dear Mrs. Zervas:

As required in your letter dated August 1, 2000, please find attached a workplan to install additional permanent groundwater monitoring wells in the MW19/Hot Spot 1 area, located at the northwest corner of the above-referenced site. The installation and sampling of these wells will finalize shallow groundwater delineation efforts in the area, and augment our current understanding of shallow groundwater flow. On behalf of LEC, we request that a representative from the NJDEP be on-site during the installation of the proposed groundwater wells. We make this request to ensure that actual well placement is acceptable, and to receive on-site approval of workplan deviations (i.e. well relocation) if unknown site conditions require such action.

As discussed in the attached workplan, RMT believes that available data adequately defines groundwater flow direction and the lateral and vertical extent of groundwater contamination. Data show that groundwater flow directions are consistent for the January, April, and July 2000 groundwater monitoring events. The lateral component of groundwater flow is to the north and northeast and shows that groundwater is not migrating across Ross Street. The isoconcentration contours presented earlier this year are generally perpendicular to the groundwater contours (except at the leading edge of groundwater contamination) and thus agree well with flow direction as defined by the groundwater elevation contours. The curving of groundwater flow from north to northeast agrees with the fact that the regional sewer intercepts the groundwater table. While there is some room for interpretation in drawing the groundwater contours, we have not been able to re-interpret the actual data to an extent that would show migration from the zone of contamination across Ross Street. Our strict adherence to actual data when drawing the groundwater contours is logical, and we believe that our analysis of other possible interpretations of the data result in the most reasonable interpretation.

Data also show a downward trend in dissolved phase VOC concentrations over time, and that the concentrations existing in the furthest downgradient well are only slightly elevated above groundwater cleanup criteria. Furthermore, concentrations at this downgradient leading edge appear



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to be decreasing over time. Nevertheless, we agree that a "clean-zone well" does not exist, and so we propose to install a well that will better define the downgradient extent of contamination.

Data also show that the regional sewer line exists within a bed of relatively permeable granular material placed within the poorly permeable glacial sediments. We agree that this condition could provide a preferential pathway for migration of groundwater contaminants along the sewer line, although the isoconcentration and groundwater elevation contours together strongly suggest that little to no contaminants could reach the sewer line. Nevertheless, we propose to install another side-gradient well to further verify this thesis.

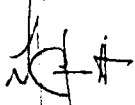
As discussed above, data show that contaminants cannot migrate beyond the sewer to the north side of Ross Street. Nevertheless, as NJDEP and EPA have previously insisted, we agree to install a third well on the north side of Ross Street, at a location we believe will actually be upgradient from the MW-19 area of groundwater contamination.

RMT regrets that EPA has resorted to accusations of "flawed logic" in justifying their insistence on additional wells in this area. While we understand that interpretations can and often do change with the acquisition of new data, we believe that the data from the new wells will simply validate the current interpretation. In the event that the new data validates our current understanding of site conditions, LEC will not install any more wells in this area.

RMT, on behalf of LEC, will secure all appropriate authorizations from the Village of Wharton prior to the installation project. RMT estimates this process to take approximately three weeks and requests that the NJDEP and United States Environmental Protection Agency (USEPA) review period coincide with local approvals so delineation efforts in the area are expeditious. Please contact me soon with any questions or comments regarding the attached workplan.

Sincerely,

RMT, Inc.



Nicholas J. Clevett  
Project Manager

Attachments: MW19/Hot Spot 1 Well Installation Workplan

cc: Cris Anderson - LEC  
Steven Cipot - USEPA  
Jim Dexter - RMT  
Central Files